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November 1, 2023

**Via ECF**

Honorable Elizabeth S. Stong  
United States Bankruptcy Judge  
U.S. Eastern District of NY Bankruptcy Court  
271-C Cadman Plaza East  
Brooklyn, NY 11201

**Re: *255 Butler LLC***  
**Chapter 11 Case No.: 23-bk-43575-ESS**

Dear Judge Stong:

This letter is submitted jointly by counsel for 255 Butler LLC (the “Debtor”) and counsel for 255 Butler Associates LLC (“Associates”) pursuant to Your Honor’s Order Scheduling Conference on Application for Order to Show Cause and the Relief Requested therein, entered on October 27, 2023 (the “Order”).

At the outset, the parties wish to thank the Court for hearing this matter on short notice.

Prior to and subsequent to the entry of the Order and the filing of the Order to Show Cause Seeking Limited Modification of the Automatic Stay (the “Order to Show Cause”), counsel for the Debtor and counsel for Associates met and conferred concerning the relief requested in the Order to Show Cause. Although no resolution has been reached, the parties have agreed that the Debtor will have ten (10) days from today to file responsive papers with respect to the Order to Show Cause and Associates shall have ten (10) from Debtor’s filing to file a reply. As part and parcel of this Agreement, Debtor has agreed: (i) that the time period set forth in the Notice of Non-Payment and Default by which Associates must cure the alleged defaults shall be extended to ten (10) days after the Court rules on the relief requested in the Order to Show Cause, and (ii) the hearing on the Order to Show Cause will be adjourned to a date set by the Court. If the terms of this Agreement meet with Your Honor’s approval, the parties will place such terms on the record at the hearing.

Respectfully submitted,

/s/ Scott A. Steinberg  
Scott A. Steinberg, Esq.

/s/ J. Ted Donovan  
J. Ted Donovan, Esq.

SAS:cbc  
cc: All Parties (*via ECF only*)